



① FEI) - can you do? YES
② TMB

INTERNAL CORRESPONDENCE

SILICONES & URETHANE INTERMEDIATES

P. O. BOX 8361, SOUTH CHARLESTON, WEST VIRGINIA 25303

To (Name) T. M. Bossick
Division R. C. Hazelton
Location R. D. Nelson
J. L. Worstell

Copy to
M. E. Hall*
T. E. Lawrence
H. M. Parker*

Date July 1, 1981

Originating Dept. Environmental Protection

Subject PCB Questionnaire: Totally
Enclosed Uses of PCB's

*Letter Only

Attached find the second PCB survey form referred to in Ed Hall's June 12 letter. Please complete the questionnaire and return it to: Dr. H. M. Parker, NYO-22 by July 27, 1981 so that he can compile the information and submit it to the C.M.A. by August 11. It is believed that all the questions can be answered for your location from existing data.


R. T. Kramer

RTK:ke
Ext. 3059

Attachment

MPM0000634

EPA004703



INTERNAL CORRESPONDENCE

UNION CARBIDE CORPORATION

270 PARK AVENUE, NEW YORK, NEW YORK 10017

To (Name) Attached Distribution
Division
Location
Floor Number

Date June 25, 1981
Originating Dept. Health, Safety and
Environmental Affairs
Floor Number 22

Copy to

Answering letter date

Subject PCB Questionnaire: Totally
Enclosed uses of PCB's

Ladies & Gentlemen:

Attached is the second PCB survey form as outlined in the June 12 letter of M. E. Hall. (Refer June 12 letter for details).

Please return the completed questionnaires to me by July 27 so the information may be submitted to the C.M.A. by August 11, 1981.

If there are any questions, please advise me.

Sincerely,

H. M. Parker /cc
H. M. Parker

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GENERAL INSTRUCTIONS FOR THE
SURVEY OF ENCLOSED USE OF PCB IN
THE CHEMICAL INDUSTRY

NOTE: THIS SURVEY DOES NOT REQUIRE YOU TO PERFORM ANY ANALYTICAL TESTING! RESPONSES CAN BE MADE USING CURRENTLY AVAILABLE INFORMATION.

GENERAL INFORMATION AND ORGANIZATION OF THE SURVEY

Enclosed is a brief CMA survey for reporting on the totally enclosed and related uses of PCB and PCB contaminated fluids in equipment used by your firm. This survey will determine a few key facts about the number of such items, the quantity of PCB they contain, and your firm's experience with leakage. It is believed that all questions can be answered from existing data.

Relationship to EEI Survey

The Edison Electric Institute (EEI), along with the National Electrical Manufacturers Association and other industry intervenors in Environmental Defense Fund vs. the Environmental Protection Agency, has designed a data-gathering and analytical effort aimed at supporting a definition of "totally enclosed" electrical equipment. The study is limited to electric utility companies. This study, termed the EEI/ Utility Solid Waste Activities Group (USWAG) Study, is described in the Court Order on Inspection and Maintenance, 46 FR 16090, at Appendix A.

It is envisioned that the findings of the EEI/USWAG study of the electric utility industry will be broadly applicable to industry generally, including the chemical industry. The CMA Special Project Panel on PCBs has determined that, to the extent that equipment and procedures are common, extrapolation of the EEI study to the chemical industry will be assisted by compiling an inventory of transformers and capacitors in use by member companies. To guard against inappropriate inferences from the EEI study, the Panel will include with the data collected in this survey and submitted to EPA, a description of significant differences in operating conditions between use in the chemical industry and use by electrical utility companies. This description of significant differences will include such factors as maintenance, special design of equipment, and special considerations on replacement costs.

Inclusion of Non-Electrical Equipment in CMA Survey

CMA member companies have requested that use of PCB in heat transfer systems and hydraulic systems be addressed in this survey. These data are being collected to provide information on the impact of any EPA suggested change in the currently authorized use of PCB contaminated fluids in these systems at concentrations below 50 ppm.

Collection of Leakage Data

CMA plans to address the issue of leakage rates of electrical transformers containing PCB in its submission to EPA. Under the Interim Measures Program promulgated by EPA, PCB transformers and certain PCB contaminated transformers are required to be inspected on a regular basis, commencing May 10, 1981 (FR 46 16040). It is believed that the type and incidence of transformer leakage in the chemical industry may differ substantially from the experience of the utility industry, and the EEI/USWAG survey would not show this difference. In this present survey, CMA asks your firm to report on the incidence of leaks found as a result of your implementation of the interim measures program and any other data or information available. This survey does include leak factors for transformers whose PCB concentration is below 500 ppm.

REPORTING IS RESTRICTED TO STANDARD INDUSTRIAL CLASSIFICATION CODE (SIC) 28

This survey is being conducted by CMA for the chemical industry. Therefore, in responding to this survey, please limit your responses to equipment owned by the firm and used in conjunction with your chemical manufacturing as defined in SIC 28. Please see CMA letter mailed May, 1981 for clarification of manufacturing covered by SIC 28.

REPORTING BY SUBSIDIARY AND PARENT COMPANIES

This survey is being mailed to all firms who are members of the Chemical Manufacturers Association, and may be mailed to firms who are members of other associations as well as CMA. This approach will mean that two organizations within a parent company may receive questionnaires. Before returning your questionnaire, please be sure that the responses are not duplicated in responses made by another part of the firm.

IDENTIFYING INFORMATION AND RETURN OF COMPLETED FORMS

All responses to this totally enclosed survey are confidential and will be handled by the Regulatory Research Service (RRS) as described in documents included in the original mailing of PCB survey questionnaires

sent to your firm. The confidentiality agreement included in that original mailing of questionnaires covers all responses to the questionnaire included herein.

We ask that you identify your firm on the enclosed survey form transmittal sheet and provide the name and phone number of a person to call, if the RRS has a problem in processing your responses. On receipt of your response, RRS will review the forms submitted. If there are no problems in processing the forms, or after a follow-up phone call, RRS will separate this cover sheet from the forms, thus effectively preventing any possibility of future identification of data with source.

Please note that the final response date for the totally enclosed survey has been extended to September 15, 1981, in order to take advantage of information which may be collected in the first quarter of the EPA Interim Measures Program. The response date for return of the survey on incidental manufacture, processing, distribution and use of PCB REMAINS AUGUST 11, 1981. You may, if you wish, return the enclosed form and transmittal sheet with your responses to the survey of incidental manufacture, processing, distribution and use of PCB, or you may return this totally enclosed use survey response separately from the other questionnaire. In either case, they are to be mailed to:

Regulatory Research Service
1100 17th Street, N.W. Suite 800
Washington, DC 20036

SPECIFIC INSTRUCTIONS

The instructions and applicable definitions are on the transmittal sheet and the response sheets. Please feel free to call Alan Pittaway of RRS at (202) 862-9410 for any further guidance or information you may desire. Respond only on equipment owned by the firm.

ALL RESPONSES FOR THE TOTALLY ENCLOSED SURVEY ARE DUE NOT LATER THAN SEPTEMBER 15, 1981.

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